

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA**

Chloe Richardson Hammed,

Plaintiff,

v.

Camden Development Inc., Camden
Property and Trust, Hunter Warfield,
Experian Information Solutions, Inc.,
Equifax Credit Information Services,
TransUnion LLC, Sage Green,

Defendants.

CASE NO. _____

NOTICE OF REMOVAL

Kaela Palmiter

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Telephone: 404-581-8031

Attorney for Defendant

Experian Information Solutions, Inc.

Pursuant to 28 U.S.C. § 1441 *et seq.*, Defendant Experian Information Solutions, Inc. (“Experian”) hereby files this Notice of Removal of the above-captioned action to this Court and state as follows:

1. Experian, Hunter Warfield, TransUnion LLC, Camden Development Inc., Camden Property and Trust, Equifax Information Services, Inc., and Sage Green are Defendants in Civil Action No. 23-A-06514-6 filed by Plaintiff Chloe Hammed (“Plaintiff”) in the Gwinnett County Superior Court for the State of Georgia (the “State Court Action”).

2. All Defendants that contend that they have been properly served have consented to this removal. Defendants that have been properly served and have consented to removal are as follows: Experian, TransUnion LLC, Hunter Warfield, and Sage Green.

3. The Complaint in the State Court Action was filed with the Clerk of the Gwinnett County Magistrate Court on August 9th, 2023. An Amended Complaint was filed in the Gwinnett County Superior Court on August 30th, 2023.

4. This Notice is being filed with this Court within thirty (30) days after Experian received a copy of Plaintiff’s initial pleading setting forth the claims for relief upon which Plaintiff’s action is based.

5. This Court is the proper district court for removal because the State Court Action is pending within this district.

6. Pursuant to 28 U.S.C. § 1446(a), a copy of all process, pleadings, and orders served upon the Defendants that have been properly served and consent to removal in the State Court Action is attached hereto as Exhibit A.

7. Experian is a corporation which, for monetary fees, regularly engages in whole or in part in the practice of assembling consumer credit information or other information on consumers for the purpose of furnishing consumer reports to third parties. Experian uses means or facilities of interstate commerce for the purpose of preparing or furnishing consumer reports, and therefore is a “consumer reporting agency” within the meaning of 15 U.S.C. § 1681a(f).

8. TransUnion LLC is a corporation which, for monetary fees, regularly engages in whole or in part in the practice of assembling credit information or other information on consumers for the purpose of furnishing consumer reports to third parties. TransUnion LLC uses means or facilities of interstate commerce for the purpose of preparing or furnishing consumer reports, and therefore is a “consumer reporting agency” within the meaning of 15 U.S.C. § 1681a(f).

9. Hunter Warfield is a corporation which regularly furnishes information to one or more consumer reporting agencies about its transactions or

experiences with consumers, and therefore is a “furnisher of information” within the meaning of 15 U.S.C. § 1681s-2.

10. Sage Green is a representative of Hunter Warfield, which is a corporation that regularly furnishes information to one or more consumer reporting agencies about its transactions or experiences with consumers, and therefore is a “furnisher of information” within the meaning of 15 U.S.C. § 1681s-2.

11. The claims for relief against Defendants alleged in the State Court Action arise under the Fair Credit Reporting Act, 15 U.S.C. §§ 1681 *et seq.* Thus, this Court has original subject matter jurisdiction over the above-captioned action pursuant to 28 U.S.C. § 1331 and 15 U.S.C. § 1681p. The above-captioned action may properly be removed to this United States District Court pursuant to 28 U.S.C. § 1441(a).

12. Promptly after the filing of this Notice of Removal, Experian shall provide notice of the removal to Plaintiff and shall file a copy of this Notice with the clerk of the Court in the State Court Action, as required by 28 U.S.C. § 1446(d),

13. Defendants hereby reserve any and all rights to assert any and all defenses and/or objections to the Complaint. Defendants further reserve the right to amend or supplement this Notice of Removal.

Dated: September 8, 2023 Respectfully submitted,

/s/ Kaela Palmiter

Kaela Palmiter

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